

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HILDA R. MUINOS,

Plaintiff,

v.

THOMAS NELSON, INC.,

Defendant.

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Index No. 08-cv-0271

J. Daniels

DEFENDANT'S NOTICE OF MOTION TO TRANSFER VENUE


PLEASE TAKE NOTICE that upon the annexed Affidavit of Frank Wentworth, Esq., sworn to March 5, 2008 and the accompanying Memorandum of Law, the undersigned move this Court at the United States Courthouse, 500 Pearl Street, New York, New York for an Order, pursuant to Section 1404 of Title 28 of the United States Code, granting defendant's Motion to Transfer Venue, on the grounds that the Middle District of Tennessee is a more appropriate venue for this action, and granting such other and further relief as the Court may deem just and proper under the circumstances.

PLEASE TAKE FURTHER NOTICE that, in accordance with Rule 6.1(b) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, plaintiff's opposition papers are to be served no later than March 19, 2008 and defendant's reply papers are to be served no later than March 26, 2008.

Dated: New York, New York
March 5, 2008

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: 
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